

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

**1:05-cr-10081-MLW-ALL**

**UNITED STATES OF AMERICA**

**V.**

**ALEX S. NEWMAN**

**DEFENDANT'S MOTION IN LIMINE: OTHER BAD ACTS**

Now comes the Defendant, through counsel, and respectfully moves that the Government be prohibited from offering any evidence pertaining or relating to any alleged illegal conduct or acts other than those charged in the current indictment in its case in chief.

In support of the within motion the Defendant, through counsel, states that the within request is consistent with an agreement reached between the parties concerning the admission of evidence of other bad acts.

Respectfully submitted,  
Alex Newman  
By his attorney,

/s/ Juliane Balliro  
Juliane Balliro (BBO#028010)  
Wolf, Block, Schorr & Solis-Cohen  
One Boston Place  
Boston, MA 02108  
617-226-4000

Dated: December 27, 2005

**Certificate of Service**

I hereby certify that, on December 27, 2005, I caused a copy of the foregoing to be filed electronically and via electronic mail to:

**AUSA Robert M. Kinsella**  
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/s/ Juliane Balliro  
Juliane Balliro